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June 12, 2023

VIA ECF

Honorable John P. Mastando III
United States Bankruptcy Court, SDNY
Alexander Hamilton U.S. Custom House
One Bowling Green
New York, New York 10004

**Re: Liberty Bridge Capital Management GP, LLC
Chapter 7
Case No. 20-10009-JPM**

Dear Judge Mastando:

This firm is counsel to Kenneth P. Silverman, Esq., the chapter 7 trustee (the “Trustee”) for the substantively consolidated bankruptcy estates of Liberty Bridge Capital Management GP, LLC *et al.* (collectively the “Debtors”). On February 1, 2022, the Court entered an Order granting the Trustee’s Motion establishing procedures governing adversary (the “Procedures Order”). In compliance with the Procedures Order, this letter shall serve as a status update in relation to the administration of the Debtor’s case.

There were thirty (30) adversary proceedings filed in this matter and below provides a status with respect thereto:

- Nineteen (19) Adversary Proceedings, as set forth on Schedule “A” annexed hereto, have been closed.
- On June 23, 2022, the Court entered an Order approving a stipulation of settlement by and between the Trustee and Defendant Lovecchio as set forth on Schedule “B” annexed hereto.
- On December 28, 2022, the Court entered an Order approving the stipulation of settlement by and between the Trustee and the Defendant Zagoreos as set forth on Schedule “B” annexed hereto.
- On May 23, 2023, the Court entered an Order approving the stipulation of settlement by and between the Trustee and the Defendant Patrick Pait as set forth on Schedule “B” annexed hereto.

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- As set forth on Schedule “C” annexed hereto, there are eight (8) open Adversary Proceedings for which the Trustee continues to review and analyze, in an effort to determine the best course of action for the benefit of the Debtors’ substantively consolidated estate.

If Your Honor has any questions regarding the foregoing, please have a member of your staff contact me.

Very truly yours,

s/ David J. Mahoney

David J. Mahoney

cc: Kenneth P. Silverman, Esq., Chapter 7 Trustee (via email)

Schedule A – Closed Adversary Proceedings

Defendant Name	Adv Pro No.
Amy Weinmeister	21-01234
Capital One Bank	21-01219
Christopher Moyer	21-01231
Coinbase Inc.	21-01224
ConnectOne Bank	21-01229
Cumberland Mining & Materials	21-01232
Hans Peter Edelstein Family Trust	21-01235
Harold Hilderbrand	21-01233
Kon Corporation	21-01223
Litigation Capital Investors, Inc.	21-01227
Pensco Trust Co.	21-01238
Plaintiff Holding V, LLC	21-01228
Richard Brady	21-01230
Sanocki Newman & Turret, LLP	21-01222
CRM Passport LLC	21-01221
Javlin Capital LLC	21-01226
JTC Americas f/k/a NES Financial Corp.	21-01220
VFS, Inc.	21-01236
Alana Birnbaum	21-01241

Schedule B – Order Approving Stipulation Entered - Adversary Proceeding

Defendant Name	Adv Pro No.
Lawrence Lovecchio	21-01237
Nicholas D. Zagoreos	croman
Patrick Pait	21-01243

Schedule C – Open Adversary Proceedings

Defendant Name(s) and Adv Pro No.	Defendants' Counsel	Status
Carob Bean Realty Corp. II Adv. Pro. No. 20-01190	Alexander Tiktin Tarter Krinsky & Drogin LLP 1350 Broadway New York, New York 10018 (212) 216-8099 And David H. Wander Tarter Krinsky & Drogin LLP 1350 Broadway New York, New York 10018 (212) 216-8081	The Summons was served on June 24, 2020. The Answer to Complaint was filed on July 23, 2020. Discovery is complete. Both parties intend to file motions for summary judgment.
Ashirus LLC Adv. Pro. No. 21-01218	Randolph E. White White and Wolnerman, PLLC 950 Third Avenue, 11 th Floor New York, New York 10022 (212) 308-0604	The Summons was served on January 19, 2022. The Answer to Complaint was filed on May 16, 2022. Based upon evidence provided to the Trustee by the Defendant, the Trustee filed a stipulation of dismissal on May 1, 2023.
Thomas Pait Adv. Pro. No. 21-01242	Eric R. Perkins Becker LLC 354 Eisenhower Parkway Livingston, New Jersey 07039 (973) 422-1100	The Summons was served on January 19, 2022. The Answer to Complaint was filed on July 11, 2022. Stipulation of Dismissal with Prejudice pursuant to Rule 7041 of the Federal Rules of Bankruptcy Procedure filed on April 11, 2023.
Steven Goldstein Adv. Pro. No. 21-01240	Vincent J. Roldan Mandelbaum Barrett PC 3 Becker Farm Road, Suite 105 Roseland, New Jersey 07068 (973) 974-9815	The Summons was served on January 19, 2022. The Answer deadline extended on consent to April 22, 2022. The Parties are engaged in settlement negotiations.
David Berkowitz Adv. Pro. No. 21-01239	Avrum J. Rosen Law Offices of Avrum J. Rosen, PLLC 38 New Street Huntington, New York 11743 (631) 423-8527	The Summons was served on January 19, 2022. The Answer to Complaint was filed on September 12, 2022. Trustee provided list of potential mediators to

		Defendant. Trustee is awaiting a response.
Jacqueline Nigro Adv. Pro. No. 21-01244	Pro Se 1569 NW 17 th Avenue Miami, Florida 33125 (914) 281-4791	The Summons was served on January 19, 2022. The Answer to Complaint was filed on April 26, 2023. Trustee received Defendant's Answer and Motion to Dismiss via email. Trustee filed the Answer and Motion to Dismiss on behalf of Defendant. Trustee will be filing a response to Defendant's Motion to Dismiss. Trustee has reached out to Defendant regarding mediation. Trustee is awaiting a response.
Kenneth Birnbaum Adv. Pro. No. 21-01245	Caitlin Conklin K&L Gates LLP One Newark Center, 10 th Floor Newark, New Jersey 07102 (973) 848-4049 And Jon Travis Powers White and Williams LLP 7 Times Square, Suite 2900 New York, New York 10036 (212) 868-4837	The Summons was served on January 19, 2022. The Answer to Complaint was filed on June 8, 2022. Parties are discussing the framework of mediation.
Stanley Liebowitz & Susan R. Liebowitz Adv. Pro. No. 21-01246	Avrum J. Rosen Law Offices of Avrum J. Rosen, PLLC 38 New Street Huntington, New York 11743 (631) 423-8527	The Summons was served on January 19, 2022. The Answer to Complaint was filed on September 12, 2022. Trustee provided list of potential mediators to Defendant. Trustee is awaiting a response.